

1. I oppose the RM-11392 petition by Mark A. Miller, N5RFZ who is seeking to change Amateur Radio Service automatically controlled data stations and narrower bandwidths on HF.

2. The petition RM-11392 is counter to the principles of the amateur radio service to promote experimentation. Bandwidths of digital signals should be increased not decreased in order to permit experimentation and development of high speed data networks based on existing, open standards such as U.S. Federal and Military as well as NATO standards for waveforms and data link protocols which can be implemented on the PC Sound Device ( a.k.a Sound Card) as the modem.

3. RM-11392 in my opinion is specifically directed at limiting Pactor III and the Winlink network. This technology received high praise in the House of Representatives report "A Failure of Initiative" for its successful and reliable movement of large amounts of data in the aftermath of Hurricanes Katrina and Rita. Therefore, this mode of emergency communications must not be constrained by excessive rules.

4. The RM-11392 petition's proposed 1.5 kHz bandwidth limit on data emissions is half of what is needed to implement the MIL-STD-188-110 modem which is already available in a number of free software communications tools that make use of the PC Sound Device as the Modem. These MIL-STD-188-110 software communications tools are seeing wide use by Non-U.S. based Radio Amateurs where the use of a standard PSK carrier of 1800hz with a symbol rate of 2400bps for serial tone modem operation places the bandwidth of the resulting signal at 300-3300hz requiring a 3Khz bandwidth. It is 3 Khz and NOT a 1.5 Khz bandwidth limitation if any that the rules need to be updated to provide.

5. RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

6. The FCC Amateur Radio Service's automatically controlled data sub-bands are already too narrow for the huge volume of traffic that runs on them. If a limit of 1.5 kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data methods.

7. Several of the primary established HF emergency communications networks currently in service and utilized by thousands of Amateur Radio Operators in USA would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted. Also, other services such as the Military Affiliate Radio System (MARS) would be impacted as much of the useful technology begins with the experimentation in the Amateur Radio Service and is expanded and improved when used in the MARS system.

8. The RM-11392 Petition is an attempt to restrict innovation, retard technological advancement, and limit emerging emergency data communications systems within the Amateur Radio Service. Please do adopt any part of RM-11392.